

Judge: Christopher M. Alston
Chapter 7

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re

CHRIS YOUNG DONG YOO and
JIEUN SONG YOO,

Debtors

IN HO HWANG, EUN (ESTHER)
KOH, CHANG KYU LEE, KI-
CHANG PARK, and CHUNG HO
WOO and KAB SUN WOO,
husband and wife,

Plaintiff,

v.

CHRIS YOUNG DONG YOO and
JIEUN SONG YOO,

Defendants.

NO. 16-10191-CMA

ADV. NO. 16-01097-CMA

PLAINTIFF'S CR 26(a)
DISCLOSURES

Plaintiff's CR 26(a) Disclosures 16-01097CMA
Page 1 of 8

JOHN G. LLEWELLYN, PLLC
ATTORNEYS AND COUNSELORS AT LAW
4847 CALIFORNIA AVE SW, SUITE 100
SEATTLE, WA 98116
V 206-923-2889 F 206-923-2892

1 Comes now Plaintiffs, appearing by and through their attorney of record
2 Courtland Shafer and John G. Llewellyn, PLLC, and hereby provide the
3 following disclosures pursuant to CR 26(a):
4

5 WITNESSES
6

7 1. Plaintiffs In Ho Hwang, Eun (Esther) Koh, Chang Kyu Lee, Ki-Chang
8 Park, Chung Ho Woo, and Kab Sun Woo
9

10 c/o Law Offices of John G. Llewellyn, Counsel. Have knowledge of the
11 fraudulent investments at issue, and the facts and circumstances involved.
12

13
14 2. Defendants Chris Young Dong Yoo and Jieun Song Yoo.

15 c/o Darrel Carter, counsel
16 Plaza East Building, Suite 380
17 11100 NE 8th St.
18 Bellevue, WA 98004
19

20 Have knowledge of the investments, and may have knowledge relevant
21 for the purposes of establishing the nature of the investments involved and the
22 disposition of proceeds.
23

24 3. Michael Greiner
25

1 Blue Moon Wealth Advisory, LLC

2 155 108th Ave NE, Suite 204

3 Bellevue, WA 98004

4 (425) 450-1055

5
6
7 Former co-manager of several of the Summit Investment LLC's that were
8 used to further the Yoo fraud. Has knowledge of the business practices of
9 Defendants. Also may have knowledge concerning Defendants' conversion of
10 funds from the various Summit entities to themselves.
11

12
13 4. Raymon Holmdahl and Kanako Matsumoto

14
15 Peterson Sullivan LLP

16 Two Union Square, 601 Union Street, Suite 2300

17
18 Seattle, WA 98101

19 (206) 382-7777

20
21 Former auditors of Summit Stable Value Fund. Have knowledge of the
22 business practices of Defendants, and how Defendants misrepresented the
23 conditions of Summit Stable Value Fund.
24
25

1 5. David and Esther Fleming

2 c/o David Neuman

3 Israels & Neuman

4 10900 NE 8th St., Suite 1000

5 Bellevue, WA 98004

6 (206) 795-5798

7
8 Former investors with Chris Yoo and Summit. Has knowledge of the
9 business practices of Defendants.
10

11
12 6. Hyun Jung Hong

13 c/o William R. Spurr, attorney at law

14 1001 Fourth Avenue, Suite 4400

15 Seattle, WA 98154

16 Phone: (206) 682-2692

17
18 Former investors with Chris Yoo and Summit. Has knowledge of the
19 business practices of Defendants.
20

21
22 7. Sonny Ko

23 Whereabouts Unknown

24
25 Mr. Ko is a brother of Jieun Yoo, and a participant in Summit.

1
2 8. Woo J. Chang and Andrew Hong

3
4 Whereabouts Unknown

5
6 Messrs. Chang and Hong were purportedly investment managers with
7
8 the Summit entities that are the vehicles for the fraud of Defendants.

9
10
11 9. A Designated Representative of the Securities and Exchange

12 Commission

13 c/o Sandra Lavigna
14 444 Flower St., Suite 900
15 Los Angeles, CA 90071
16 (323)-965-3996

17 Will be called for information regarding the SEC investigation of Chris
18 Yoo and various Summit investment entities.

19
20
21 10. Chul Y. Park, Charlie J.C. Lee, and Yong W. Chang

22 Whereabouts unknown

23
24 Supposedly, these individuals were assistants in the management of
25 Summit Stable Value Fund.

1
2 DOCUMENTS
3
4

5 Plaintiff provides the following documents:
6
7

8 Account Statements for Plaintiffs

9 Promissory Notes between Plaintiffs and Chris Yoo, Summit Stable Value Fund
10
11 Manager

12 Promotional Materials for Summit Asset Strategies and Summit Stable Value
13 Fund
14

15 Emails between Plaintiffs and Chris Yoo re: Summit investments

16 Text message from Chris Yoo to Chung Ho Woo

17
18 Transfer Documents from Equity Trust Company

19 Account Agreement from Equity Trust Company

20 Summit Stable Value Fund "Private Placement Memorandum"
21

22 Email from Chris Yoo re: SEC settlement

23 Millenium Trust Company Account Statement (Chung Ho Woo)

24 Summit Stable Value Fund "Financial Statements" for 2012 and 2013
25

Plaintiff's CR 26(a) Disclosures 16-01097CMA
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1 Summit Stable Value Fund "Subscription Agreement Addendum"

2 Breard and Associates' documents re: 2015 Audit of Summit Stable Value Fund.

3
4
5 DAMAGES

6 This is a claim for nondischargeability. Damages are based upon the
7
8 amounts invested and have already been disclosed in Plaintiff's respective
9 Proofs of Claim, which are incorporated by reference.

10
11
12 DATED this 25th day of May, 2016.

13
14
15 /s Courtland T. Shafer

16 COURTLAND T. SHAFER, WSBA #22000

17 JOHN G. LLEWELLYN, PLLC

18 ATTORNEYS AND COUNSELORS AT LAW

19 4847 CALIFORNIA AVE SW, SUITE 100

20 SEATTLE, WA 98116

21 TELEPHONE: 206-923-2889

22 FAX: 206-923-2892

23 ATTORNEY FOR PLAINTIFFS ATTORNEY FOR PLAINTIFFS IN HO HWANG, EUN
24 (ESTHER) KOH, CHANG KYU LEE, KI-CHANG PARK, CHUNG HO WOO, AND KAH
25 SUN WOO

1 PROOF OF MAILING

2 I, Courtland T. Shafer, hereby certify that, on May 25, 2016, copies of this

3
4 Disclosures, with accompanying documents were emailed to:

5 Darrel Carter, counsel
6 Plaza East Buiklding, Suite 380
7 11100 NE 8th St.
8 Bellevue, WA 98004

9 /s Courtland T. Shafer

10 COURTLAND T. SHAFER, WSBA #22000
11 JOHN G. LLEWELLYN, PLLC
12 ATTORNEYS AND COUNSELORS AT LAW
13 4847 CALIFORNIA AVE SW, SUITE 100
14 SEATTLE, WA 98116
15 TELEPHONE: 206-923-2889
16 FAX: 206-923-2892

17 ATTORNEY FOR PLAINTIFFS IN HO HWANG, EUN (ESTHER) KOH, CHANG KYU LEE,
18 KI-CHANG PARK, CHUNG HO WOO, AND KAH SUN WOO
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20
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22
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